

# EXHIBIT N

# RE: LUPE v. Abbott, 5:21-cv-844 (WD Tex): Discovery Correspondence - M&C (Intervenor-Defendants)

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Fri 9/23/2022 3:46 PM

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Elena:

Thanks for following up. We note that the Fifth Circuit has stayed all discovery in these matters until September 29. Nonetheless, we are happy to provide you an update on our discovery efforts.

This is the first time we are hearing of any issues with our interrogatory responses, which we served on August 12. As you note, 6 of our responses to your 10 interrogatories indicate that we will identify documents responsive to those interrogatories. Those responses are appropriate: the interrogatories specifically asked us to “[i]dentify (including by Bates number if or once assigned)” any such documents.

In any event, our August 29 letter already identified custodians for 4 of the 5 GOP intervenors. We have begun collecting documents from all 5 intervenors and loading them into our review platform. We expect be in a position shortly after the stay expires to provide you dates certain for identifying custodians for the remaining intervenor and for sharing our search terms.

As we mentioned in our August 29 letter, we are not yet in an informed position to accept or decline Plaintiffs’ proposal regarding the existing protective orders because we are still collecting and reviewing documents. We therefore are unable to determine at this juncture whether the existing protective orders are adequate to protect our clients’ interests. As we promised, we will inform you of our position on that proposal as soon as we are able to do so.

Finally, like many members of your team, our team is heading to trial in another matter over the next several weeks. The discovery schedule in this case already contemplates all parties’ counsel’s conflicting trial schedules.

Please let us know if you would like to discuss this further.

Thanks,  
John

John M. Gore  
Partner

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**Subject:** RE: LUPE v. Abbott, 5:21-cv-844 (WD Tex): Discovery Correspondence - M&C (Intervenor-Defendants)

**\*\* External mail \*\***

Counsel,

We are in receipt of your August 29 letter concerning document production and your August 12 Responses and Objections to Plaintiffs' First Set of Interrogatories. We write to better understand the status of the GOP Intervenors' collection and review of documents in this matter.

Plaintiffs first served requests for production on the GOP Intervenors over two months ago. Nonetheless, your correspondence reflects that the GOP Intervenors' collection and review of documents remains at a very preliminary stage and that you have not yet collected documents from your clients, never mind begun producing any documents in response to our two-month-old requests. At the same time, your responses to our First Set of Interrogatories reflect that you intend to address most of our interrogatories by identifying documents that have not been produced to us.

To keep discovery moving forward, please provide us this week with dates certain for when you will provide proposed custodians for each GOP Intervenor and proposed search terms for collecting documents from these custodians. Please also indicate whether GOP Intervenors intend to accept or decline Plaintiffs' proposal regarding the existing protective orders.

We are glad to make ourselves available to discuss any of these issues.

Best regards,

Elena

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**Subject:** RE: LUPE v. Abbott, 5:21-cv-844 (WD Tex): Discovery Correspondence - M&C (Intervenor-Defendants)

Counsel,

Attached please find discovery correspondence regarding the meet and confer held on August 11, 2022. Please let us know if you would like to discuss.

Best,  
Chuck

--

Chuck Roberts  
Associate

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**Sent:** Friday, August 19, 2022 9:26 PM

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**Subject:** LUPE v. Abbott, 5:21-cv-844 (WD Tex): Discovery Correspondence - M&C (Intervenor-Defendants)

**\*\* External mail \*\***

Counsel,

Attached please find discovery correspondence memorializing the meet and confer held on August 11, 2022, regarding GOP Intervenor's Responses and Objections to Plaintiffs' First Set of Requests for Production. Please let us know if you would like to discuss.

All the best,

Elena

**Elena Rodriguez Armenta** (she/her)

Litigation Associate\*

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\*Admitted in New York only. Pending approval of application for admission to D.C. Bar. Practice supervised by D.C. Bar members.

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